

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003

Tel: (212) 556-2100
Fax: (212) 556-2222
www.kslaw.com

Arthur Steinberg
Direct Dial: 212-556-2158
asteinberg@kslaw.com

July 9, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (REG)
Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically, today, July 9, 2015, New GM was served with the following documents, each of which was filed with the Second Circuit Court of Appeals: (i) *Elliott Petitioners’ Reply to Wilmington Trust Company’s Response to Their Petition for Permission to Appeal*, (ii) *Elliott Petitioners’ Response and Reply to Certain Plaintiffs’ Motion for Leave to Intervene and to Respond to the Petition*, (iii) *Elliott Petitioners’ Reply to General Motors LLC’s Response to Their Petition for Permission to Appeal*; and (iv) *Motion For Leave To Intervene In Appeal And To Respond To Cross-Petitioner’s Petition For Permission To Appeal*. Copies of the foregoing documents are annexed hereto as Exhibits “1” through “4” respectively.

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

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AJS/sd
Encl.

cc: Edward S. Weisfelner
Howard Steel
Sander L. Esserman
Jonathan L. Flaxer
S. Preston Ricardo
Matthew J. Williams
Lisa H. Rubin
Keith Martorana
Daniel Golden
Deborah J. Newman
Jamison Diehl
William Weintraub
Steve W. Berman
Elizabeth J. Cabraser
Robert C. Hilliard
Gary Peller